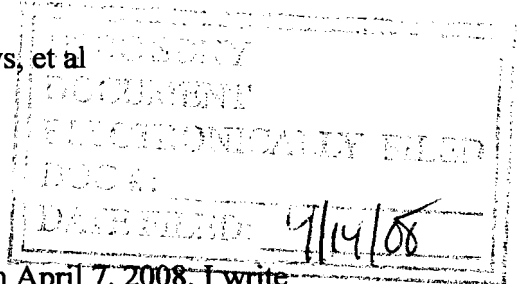


BY CERTIFIED MAIL
The Honorable Debra C. Freeman
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 525
New York, NY 10007

MEMO ENDORSED *JS*

APR 11 2008

Re: Jackson, et al v. Executive Office for United States Attorneys, et al
No. 07 Civ. 6591 (KJH)(DCF)



Dear Judge Freeman:

Plaintiff was provided with the defendants motions to dismiss on April 7, 2008. I write respectfully requesting of this Court an enlargement of time in which to respond to and oppose the defendants request for dismissal or for judgment in this matter on their pleadings pursuant to Rule 12(b) or 12(c) as plaintiff is unable within this allotted time frame under the requirements of rule 56 of the Federal Rules of Civil Procedure to make adequate inquiries, lodge any reasonable objections and respond to the government's motion. Plaintiff lacks any sort of representation and is not adequately trained to appropriately and expediently examine and assess the government's pleading and the associated rules of procedure within the time limit provisions. There is a need to search for, obtain review and interpret papers, reports, and legal authorities which may hold substantial weight in submitting findings to the Court that are applicable to plaintiff(s) complaint. Moreover, at this present time plaintiff is limited in search and research time because as of March 27, 2008 under the new crack law plaintiff was released from a Bronx re-entry center to the street without a release address and is therefore homeless (which can be verified by United States Parole Officer Miranda L. Hoyer – 212.805.5078) and spends a great deal of time reporting to probation, commuting to

employment in midtown Manhattan and seeking shelter. These special circumstances significantly hinder plaintiff's pursuit of papers, affidavits and witness statements as well as plaintiff's ability to reach others who may have sworn statements, personal knowledge and those who have substantial subject matter interest herein that would be admissible as evidence.

granted { This is the plaintiff's first request for the Court's consideration of an additional 50 days to respond in this matter and if granted would therefore make the plaintiff(s) filing due on or before June 6, 2008. }

Thank you for your consideration of this request.

Respectfully submitted,

Sharon Jackson
Sharon Jackson
April 9, 2008

MEMO ENDORSED

cc: BY EMAIL AND CERTIFIED RETURN RECEIPT

Andrew M. McNeela, AUSA
U.S. Department of Justice
86 Chambers Street
New York, NY 10007

The requested extension is granted. Defendants reply, if any, shall be served and filed no later than June 30, 2008

SO ORDERED: DATE: 4/14/08

.....*Debra Freeman*.....
DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE